

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-10986 NG

ULYSSES RODRIGUEZ CHARLES,
Plaintiff,

v.

CITY OF BOSTON, et. al.,
Defendants.

LOCAL RULE 16.1 JOINT STATEMENT OF THE PARTIES

Pursuant to the Court's request and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above named parties have conferred and propose the following pretrial schedule:

1. Proposed Discovery and Motion Schedule:
 - (a) Automatic disclosures to be completed on or before March 4, 2005.
 - (b) Fact discovery will be completed by September 30, 2005.
 - (c) Plaintiff will disclose his expert(s) and produce the Rule 26(a)(2)(b) report by October 31, 2005. Defendants will disclose their expert(s) and produce the Rule 26(a)(2)(b) report by November 30, 2005.
 - (d) The parties will serve motions for summary judgment no later than January 13, 2006.
2. The parties have not yet agreed to a trial by a magistrate judge.

Respectfully submitted,

DEFENDANTS, STANLEY BOGDAN
and THE CITY OF BOSTON,
Merita A. Hopkins
Corporation Counsel

PLAINTIFF, ULYSSES R. CHARLES
By his attorney:

By their attorneys:

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